

THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA

(10)
12-27-00
SC

JOSEPH M. CRAVEIRO Jr.

No. 1:00-00-1714

T. Caldwell

V.

U.S.A. Et, al

Warden; L.S.C.I. Allenwood

FILED
HARRISBURG, PA

DEC 26 2000

MOTION FOR DISCOVERY

MARY E. D'ANDREA, CLERK

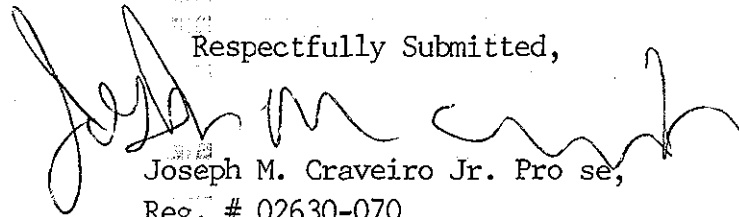
[Signature]

NOW comes the above named herein Petitioner, Who requests this Honorable Court to grant the Above Motion for Discovery under F.C.R.P. 26 (B), and Rule 6 (b). The Petitioner requests to invoke Discovery and states the Following reasons;

- 1.) Petitioner will prove through Discovery that appointed Counsel during the State charges, that is now being called into question, was not knowledgeable of the Law.
- 2.) That Counsel had misled the Petitioner by telling him that the Charge of Breaking and entering, and his Plea of NOLO CONTENDERE, could not be used against the Petitioner in the future, because the charge would not be part of the Petitioners' record.
- 3.) That Counsel never moved to Dismiss the "Information" Under R.I. State Rule 6(2) Superior Court R.C. Procedure; and, Rule 7, Where it states that if a Defendant is charged with a crime that may exceed imprisonment for a term of more than One Year, he shall be prosecuted by "indictment", not an "information".
- 4.) Petitioner will also prove that on Post-conviction, Attorney (R. Consentino) had abridged Petitioners' Rights by not having heard the proper issues set out in the Petitioners' Post-Conviction relief within the State Courts. (case no. 97-2769); and Case No. 99-120 Supreme Court.

WHEREFORE, the Petitioner prays that this Honorable Court will Grant his Motion for Discovery.

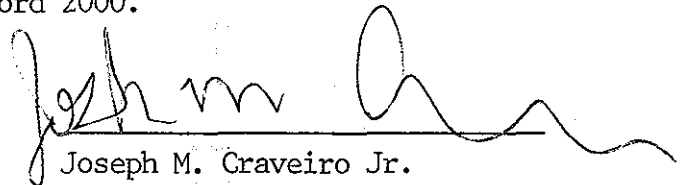
Respectfully Submitted,



Joseph M. Craveiro Jr. Pro se,
Reg. # 02630-070
L.S.C.I. Allenwood
P.O. Box 1000
White Deer, PA. 17887

Certificate of Service

I, Joseph M. Craveiro Jr., hereby certify and state, that I have Mailed via U.S. Mail, a true Copy, of the above named Motion to the Respondents, on this 21st. day of December, in the year of our lord 2000.


Joseph M. Craveiro Jr.

cc; U.S.A. Attorney
Clerk of Courts
Warden; L.S.C.I. Allenwood